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Remarks

In the Office Action, the Examiner noted that the claims 1-20 are pending in the application and that the claims 1-16 and 18-20 are rejected over a prior art reference. By this response, claims 9, 14, 16, 18, 19 and 20 have been amended and claim 21 has been added. Thus, claims 1-21 remain pending in the application. Applicant respectfully traverses the rejections for the reasons indicated below.

Rejection under 35 U.S.C. § 112, second paragraph

Claims 9, 14, 16, 18, 19 and 20 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite. While the Applicant is of the opinion that claims 9, 14, 16, 18, 19 and 20 are in fact definite, Applicant has amended the claims to further emphasize the claimed invention as suggested by the Examiner.

With respect to claims 9, 14 and 16, Examiner identifies that the claim scope is uncertain since the trademark or trade name cannot be used properly to identify any particular material or product. Claims 9, 14 and 16 have been amended to comply with the definiteness requirement.

With respect to claims 18, 19 and 20, the Examiner notes that the limitation "the plurality of users" lacks sufficient antecedent basis. Claims 18, 19 and 20 have been amended to include antecedent basis for the limitation and is no longer indefinite.

Accordingly, Applicants respectfully submits that the claims satisfy the requirements under 35 U.S.C. §112, second paragraph. Withdrawal of this rejection is respectfully requested.

Rejection under 35 U.S.C. § 102(e)

Claims 1-16 and 18-20 are rejected under 35 U.S.C. §102(e) as being anticipated by Fliess et al. (US Publication Number 2004/0001103), hereafter "Fliess."

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Applicants respectfully traverse the rejection and respectfully submit that the presently claimed invention is not described by Hegli. Applicants discuss the rejection below as it applies to (a) independent claims 1 and 18-20; (b) dependent claims 2-16.

(a) Independent claim 1 and 18-20

Claim 1 states in combination:

In a computer-implemented system, a method for group collaboration through associative filing, in projects, of electronic information including at least one of structured and unstructured electronic data, documentation, and other information, cooperative with native applications that manipulate items comprising the electronic information, said group collaboration method comprising at least one of the sequential, non-sequential, and sequence independent steps of:

(A) storing at least one project of a plurality of projects, the project referencing a plurality of items;

(F) associating at least one team having at least one member with the at least one project;

(G) assigning at least one of a plurality of users as the at least one member of the at least one team;

(H) storing the at least one team in association with the at least one project; and

(I) displaying information characterizing the at least one project and the at least one team associated therewith..

Applicant respectfully submits that the cited reference (Fliess) is not relevant to the above-identified claims.

Without conceding that Fliess discloses any of the features of the present invention, Fliess is concerned with presenting data corresponding to business objects, such as projects and resources, and presenting different types of data side by side for comparison. The method disclosed by Fliess is not related to "group collaboration *through associative filing*, in projects, of electronic information including at least one of structured and unstructured electronic data, documentation, and other information, cooperative with native applications that manipulate items

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comprising the electronic information,” as recited in claim 1. Instead, Fliess teaches a method for “**modeling business objects as graphic objects using multiple graphic object characteristics to represent different aspects of the business objects.**” (Summary of the Invention)

Further, Fliess does not “associate[e] at least one team having at least one member with the at least one project” and “displaying information characterizing the at least one project and the at least one team associated therewith,” as recited in claim 1. Unlike the claimed invention, Fliess provides graphic objects for presenting all the projects when a business area is selected (Fig. 8), views when a project is selected (Fig. 9), views when a proposed project is selected (Fig. 10), and person search result and the person’s profile view (Fig. 11). Fliess further provides additional details that include project description, project manager, and location information when presenting all the projects when a business area is selected (Fig. 8). But, the method disclosed by Fliess is merely a process of modeling business objects as graphic objects, determining two-dimensional coordinates, and displaying the graphic objects in a two-dimensional chart. (Paragraphs 0025-0029, Fig. 1)

Similar arguments apply to claims 18-20 as well as addresses limitations presented in each of these claims when each is interpreted for the combination of limitations recited therein.

(b) Dependent claims 2-16

In view of the arguments presented above for the independent claims 1 and 18-20, the Applicant respectfully submits that the corresponding dependent claims 2-16 are allowable for the reasons discussed above as well as additional limitations recited in each dependent claim also interpreted in combination.

Fliess does not disclose the step of “the project being assigned to one of a plurality of project types, each of the project types being associated with at least a portion of the plurality of users, the users assigned as the at least one member of the at least one team being limited to the at least a portion of the plurality of users associated with the project type assigned to the at least one project,” as recited in claim 2. Instead, Fliess provides views when a project is selected (Fig. 9), views when a proposed project is selected (Fig. 10), and view 1400 created by an integrated program management system showing an example spending levels chart and an

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example timeline analysis chart (Fig. 14). Further, Fliess neither teaches nor suggests that “the users assigned as the at least one member of the at least one team being limited to the at least a portion of the plurality of users associated with the project type assigned to the at least one project.”

Examiner refers to Fig. 18 to suggest that Fliess discloses the step of “associating at least one functionality, task, job or role with the at least one of the plurality of users assigned to the at least one team,” as recited in claim 3. **Fliess neither teaches nor suggests** “associating at least one functionality, task, job or role with the ... users,” as recited in claim 3. Instead, Fig. 18 in **Fliess shows employee projects view that includes “alerts & notifications” view and a “task management” view** which provides an interface for tracking and updating all tasks for the employee. (Paragraph 0087, Fig. 18). Claims 4-6 is dependent directly or indirectly on claim 3 and further indirectly on claim 1 and is deemed to be allowable for reasons discussed above.

Examiner asserts that Fliess discloses the step of “redefining the at least one member assigned to the at least one team,” as recited in claim 7. Claim 7 depends on claim 1 and is deemed to be allowable for reasons discussed above. Because claim 7 is dependent on claim 1, it further includes the limitation of “associating at least one team having at least one member with the at least one project.” Fliess merely discloses graphical display including “a project manager field ... in which an executive can type the name of a potential manager for the project ... and click an assign link 1030.” (Paragraph 0070, Fig. 10) **Fliess does not teach** the step of “associating at least one team having at least one member with the at least one project.” Similar arguments apply for claims 11-13.

Similar arguments apply to claims 8, 9 and 14-16 as well as addresses limitations presented in each of these claims when each is interpreted for the combination of limitations recited therein.

Claims 2-16 depend directly or indirectly from claim 1 and are deemed to be allowable for reasons discussed above as well as additional limitations recited in each dependent claim also interpreted in combination.

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In view of the above, Applicant respectfully submit that claims 1-16 and 18-20 are not anticipated by the cited reference and respectfully request that the rejection under 35 U.S.C. § 102(e) of these claims be withdrawn.

Rejection under 35 U.S.C. § 103(a)

Claim 17 is rejected under 35 U.S.C. § 103(a) as being obvious over Fliess in view of Dewar et al (International Publication Number WO 99/22321), hereafter "Dewar." Applicants respectfully traverse the rejection and respectfully submit that there is no motivation to combine the cited references to arrive at the presently claimed invention.

Claim 17 depends directly from claim 1 and is allowable for reasons described above. In addition, claim 17 recites that "a plurality of classes are associated with a plurality of items, wherein at least two items of the plurality of items have different corresponding native applications; further comprising determining at least one keyword for at least one class, associating the determined at least one keyword with the at least one class for at least one item, associating the at least one item with the at least one project," as further claimed. The Examiner admits that Fliess does not teach or suggest the exact limitation, but argues that it would have been obvious to combine Dewar with Fliess to enable the system disclosed in Fliess to provide search capabilities and means for linking information and tasks related to each project.

Dewar does not teach either the step of "*determining at least one keyword* for at least one class" nor "*associating the determined at least one keyword with the at least one class* for at least one item," as recited in claim 17. Dewar also does not teach "*associating the at least one item with the at least one project.*" Dewar is only concerned with providing means for selecting projects having related information and means for linking information and tasks related to each project. (Page 2, lines 6-9) Further, Dewar discloses that the "linking means is arranged so that the selection means can be selectively activated to present one or more task categories and one or more information classes in each task category." (Page 2, lines 9-11) Dewar neither discloses the need for determining keywords for the classes nor the need for associating a keyword with at least one class for at least one item. Hence, there is no motivation to combine the teachings of Fliess and Dewar to provide the claimed invention. In addition, the

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proposed combination does not even show or suggest the combination of features recited in claim 17.

In view of the above, Applicants respectfully submit that claim 17 is unobvious over the cited reference and respectfully request that the rejection under 35 U.S.C. §103(a) of this claim be withdrawn.

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Conclusion

Applicant respectfully submits that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. Applicant does not concede that the cited prior art shows any of the elements recited in the claims. However, Applicant has provided specific examples of elements in the claims that are clearly not present in the cited prior art.

Applicant strongly emphasizes that one reviewing the prosecution history should not interpret any of the examples Applicant has described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, Applicant asserts that it is the combination of elements recited in each of the claims, when each claim is interpreted as a whole, which is patentable. Applicant has emphasized certain features in the claims as clearly not present in the cited references, as discussed above. However, Applicant does not concede that other features in the claims are found in the prior art. Rather, for the sake of simplicity, Applicant is providing examples of why the claims described above are distinguishable over the cited prior art.

Applicant wishes to clarify for the record, if necessary, that the claims have been amended to expedite prosecution and/or explicitly recite that which is already present within the claims. Moreover, Applicant reserves the right to pursue the original and/or complimentary subject matter recited in the present claims in a continuation application.

Any claims that have been cancelled are hereby cancelled without prejudice or disclaimer, and Applicant reserves the right to further prosecute these claims in continuing applications. In addition, Applicant has attempted to claim all embodiments disclosed in the present application, and no disclaimer of any embodiments is hereby intended by the presently pending claims.

Any narrowing amendments made to the claims in the present Amendment are not to be construed as a surrender of any subject matter between the original claims and the present

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claims; rather merely Applicant's best attempt at providing one or more definitions of what the Applicant believes to be suitable patent protection. In addition, the present claims provide the intended scope of protection that Applicant is seeking for this application. Therefore, no estoppel should be presumed, and Applicant's claims are intended to include a scope of protection under the Doctrine of Equivalents and/or statutory equivalents, i.e., all equivalents that are substantially the same as the presently claimed invention.

Further, Applicant hereby retracts any arguments and/or statements made during prosecution that were rejected by the Examiner during prosecution and/or that were unnecessary to obtain allowance, and only maintains the arguments that persuaded the Examiner with respect to the allowability of the patent claims, as one of ordinary skill would understand from a review of the prosecution history. That is, Applicant specifically retracts statements that one of ordinary skill would recognize from reading the file history were not necessary, not used and/or were rejected by the Examiner in allowing the patent application.

For all the reasons advanced above, Applicant respectfully submits that the rejections have been overcome and should be withdrawn.

For all the reasons advanced above, Applicant respectfully submits that the Application is in condition for allowance, and that such action is earnestly solicited.

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Authorization

The Commissioner is hereby authorized to charge any additional fees, which may be required for this Amendment, or credit any overpayment to Deposit Account No. 08-0219

In the event that an Extension of Time is required, or which may be required in addition to that requested in a petition for an Extension of Time, the Commissioner is requested to grant a petition for that Extension of Time which is required to make this response timely and is hereby authorized to charge any fee for such an Extension of Time or credit any overpayment for an Extension of Time to Deposit Account No. 08-0219.

Respectfully submitted,

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